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7 Attorneys for Gareth David Long

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

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| | | |
|------------------------------|---|-----------------------------------|
| 11 UNITED STATES OF AMERICA, |) | |
| |) | 2:16-cr-071-APG-EJY |
| 12 Plaintiff, |) | |
| |) | UNOPPOSED MOTION TO RETURN |
| 13 vs. |) | DEFENDANT'S PASSPORT |
| |) | |
| 14 GARETH DAVID LONG, |) | |
| |) | |
| 15 Defendant. |) | |
| |) | |
| 16 |) | |
| 17 |) | |

18 The defendant, GARETH DAVID LONG, by and through his counsel of record, Brian
19 Pugh, Assistant Federal Public Defender, submits this Motion to Return Defendant's Passport.
20 This motion is based on the attached Memorandum of Points and Authorities.

21
22 DATED this 9th day of December 2020.

23 RENE VALLADARES
Federal Public Defender

24 */s/ Brian Pugh*

25 By _____
26 BRIAN PUGH,
Assistant Federal Public Defender

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 On June 23, 2020, this Court sentenced Mr. Long to 70 months custody in the Bureau
3 of Prisons ("BOP"). ECF No. 101. Mr. Long is now serving his sentence at Giles W. Dalby
4 CI in Post, Texas. Upon completion of his sentence, Mr. Long will be deported to his
5 country of citizenship, the United Kingdom (UK). Mr. Long has an expired UK passport that
6 is in the possession of Pretrial Services. Mr. Long believes that it will be easier to renew his
7 UK passport if he has his expired passport when he is returned to the UK. He requests that
8 this Court order the return of his passport and that it be mailed¹ to his wife, Lacy Long. Mrs.
9 Long has moved to Texas to be near Mr. Long and plans to move to the UK when Mr. Long
10 is deported.
11

12
13 Pretrial Services confirmed that Mr. Long's passport is expired. Pretrial Services has
14 no objection to returning Mr. Long's expired passport.

15 The government does not oppose returning Mr. Long's expired passport.

16 Wherefore, Mr. Long respectfully requests that this Court order Pretrial Services to
17 return Mr. Long's passport by mailing it to his wife, Lacy Long.
18

19 Respectfully submitted this 9th day of December 2020.

20 RENE VALLADARES
21 Federal Public Defender

22 **IT IS SO ORDERED.**

23 
24 **U.S. MAGISTRATE JUDGE**

25 By: /s/ Brian Pugh
26 BRIAN PUGH
Assistant Federal Public Defender

Dated: December 9, 2020

¹ Mrs. Long's mailing address will be provided directly to Pretrial Services to not disclose it in this public filing.